

Exhibit D

DECLARATION OF JAMES S. RYU

1. My name is James S. Ryu and I am the Crossclaim Plaintiff in this action.
2. I submit this Declaration in support of my request for a jury trial to set damages on the default judgment in my favor against Crossclaim Defendant Karen Chon, who defamed me with false accusations that I had participated with her in the embezzlement of funds from BankAsiana.
3. At the trial to set damages, I will testify about the facts alleged in the Offer of Proof. Those facts are true and correct based on my own personal knowledge.
4. Attached hereto as Exhibits 1 and 2 are letters from my doctor about the effect of the lawsuit on my mental and physical health.
5. I rely on these along with my testimony and that of my wife and of Dr. Susan Fiester as proof of the emotional harm I suffered as a result of Chon's false and defamatory accusation that I participated in the embezzlement.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Dated: August 30, 2021


James S. Ryu

Exhibit 1

Mansoor R. Chaudry, M.D., PC

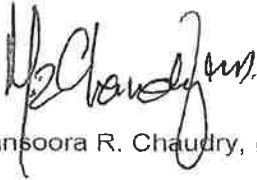
GENERAL PRACTICE
41-04 GOLDBLATT TERRACE
FAIR LAWN, NJ 07410
TEL: (201) 797-7129 FAX: (201) 703-6982

February 24, 2017

To Whom It May Concern:

This is to verify that Mr. Suk Ryu is under my professional care since July 05, 2015. He suffers from anxiety, insomnia, palpitations, and a great deal of mental stress due to his current court case. Thank you.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Mansoor R. Chaudry, M.D.", written in a cursive style.

Mansoor R. Chaudry, M.D

Exhibit

2

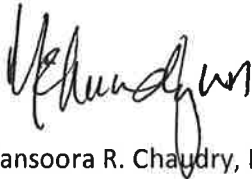
Mansoor R. Chaudry, M.D., PC

GENERAL PRACTICE
41-04 GOLDBLATT TERRACE
FAIR LAWN, NJ 07410
TEL: (201) 797-7129 FAX: (201) 703-6982

January 2, 2020

This is to verify that Mr. Suk Ryu is under my professional care since July 05, 2015. He suffers from anxiety, insomnia, palpitations, and a great deal of mental stress due to his current court case. Thank you.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Mansoor R. Chaudry', written in a cursive style.

Mansoor R. Chaudry, M.D